

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**LOUIS CROCKER, et al.,**

**Plaintiffs,**

**V.**

**CLEVELAND-CLIFFS STEEL  
CORPORATION (d/b/a AK STEEL  
DEARBORN WORKS),**

**Defendant.**

**Case No. 4:21-cv-11937-SDK-CI**

**Judge Shalina D. Kumar**

**DECLARATION OF DANELLE M. GAGLIARDI, ESQ.  
REGARDING NOTICES UNDER 28 U.S.C. § 1715(b)**

In accordance with Paragraph 3.b. of the proposed Settlement Agreement and Release (ECF No. 76-1, PageID.2041), I, Danelle M. Gagliardi, Esq., do hereby declare as follows:

1. I am an attorney in the law firm of Squire Patton Boggs (US) LLP and represent the Defendant, Cleveland-Cliffs Steel Corporation (“CCSC”), in this proceeding.

2. Paragraph 3.b. of the proposed Settlement Agreement and Release (the “Agreement”) requires that the Defendant send notice of the proposed class action settlement to (1) the U.S. Attorney General’s office, as the appropriate Federal official, and (ii) the Director of the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”), as the appropriate State official, “[w]ithin ten (10)

days of the date Plaintiffs move for entry of the Preliminary Approval Order.”

*See also* 28 U.S.C. § 1715(b).

3. The proposed settlement herein was filed by Plaintiffs on February 10, 2025.

4. On February 18, 2025, I arranged for such notices (attached as Exhibit 1 and Exhibit 2 hereto) to be sent to the following via Federal Express Priority Overnight:

Pamela Bondi  
Attorney General of the United States  
Office of the Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530-0001  
(By Federal Express – Next Day Delivery)

and

Phillip Roos  
Director  
Michigan Department of Environment, Great Lakes, and Energy  
Constitution Hall  
525 West Allegan Street  
Lansing, MI 48933  
(By Federal Express – Next Day Delivery)

Attorney General Pamela Bondi is the “appropriate Federal official” under 28 U.S.C. § 1715(a)(1), and Director Phillip Roos is the appropriate State official” under 28 U.S.C. § 1715(a)(2).

5. Such notices each included:

- a. Defendant's Notice of Removal (ECF. No. 1) with Exhibit A (Plaintiffs' Class Action Complaint and Jury Demand filed on July 20, 2021, in the State of Michigan Circuit Court for the County of Wayne) and Exhibit B (Declaration of James D. Graham), filed on August 19, 2021.
- b. A copy of the First Amended Class Action Complaint and Jury Demand (ECF. No. 4), filed herein on September 2, 2021.
- c. Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement ("MPA," ECF No. 76) filed on February 10, 2025, with the following Exhibits:
  1. The proposed Settlement Agreement and Release ("SA," ECF No. 76-1), with:
    - a. Exhibit 1-A, the Class Area Map;
    - b. Exhibit 1-B, [Proposed] Final Order and Judgment;
    - c. Exhibit 1-C, Long-form Class Notice
    - d. Exhibit 1-D, [Proposed] Preliminary Approval Order;
    - e. Exhibit 1-E, Claim Form; and
    - f. Exhibit 1-F, Short-form Class Notice
  2. Declaration of Laura L. Sheets in Support of Plaintiff's Unopposed Motion (ECF No. 76-8)

6. Delivery of the Notice to Director Roos of EGLE was confirmed via tracking from Federal Express (attached hereto as Exhibit 3).

7. Delivery of the Notice to U.S. Attorney General Pamela Bondi was confirmed via tracking from Federal Express (attached hereto as Exhibit 4).

8. This Declaration confirms that such notices were timely sent out on February 18, 2025 in accordance with the statute and Paragraph 3.b. of the Agreement.

Dated: March 4, 2025

Respectfully submitted,

s/Danelle M. Gagliardi

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*Attorneys for Defendant Cleveland-  
Cliffs Steel Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of March 2025, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, and notice of this filing will be sent to all attorneys of record by operation of the Court's electronic filing system.

s/ Danelle M. Gagliardi  
*Attorney for Defendant Cleveland-  
Cliffs Steel Corporation*